

PHILLIP A. TALBERT  
United States Attorney  
KATHERINE E. SCHUH  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ANDREW SATARIANO,  
  
Defendant.

CASE NO. 1:21-CR-00295-JLT-SKO  
  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER  
  
DATE: April 20, 2022  
TIME: 1:00 p.m.  
COURT: Hon. Sheila K. Oberto

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on April 20, 2022.
2. By this stipulation, defendant now moves to continue the status conference until June 29, 2022, and to exclude time between April 20, 2022, and June 29, 2022.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes investigative reports, body camera video, photographs, and other evidence. The government also anticipates providing supplemental discovery consisting of laboratory reports, surveillance video, and other investigative reports in the next two weeks. All of this discovery will be produced directly to counsel and/or made available for inspection and copying.

b) Counsel for defendant desires additional time consult with his client, review discovery, investigate the charges, and discuss a potential plea offer with the government.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of April 20, 2022 to June 29, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: April 12, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ KATHERINE E. SCHUH  
KATHERINE E. SCHUH  
Assistant United States Attorney

Dated: April 12, 2022

/s/ Steven Crawford  
Steven Crawford  
Counsel for Defendant  
ANDREW SATARIANO

**ORDER**

IT IS SO ORDERED.

DATED: 4/12/2022

*Sheila K. Oberto*  
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THE HONORABLE SHEILA K. OBERO  
UNITED STATES DISTRICT JUDGE